


## INTEROFFICE CORRESPONDENCE

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DATE: January 29, 1992

TO: All Managers, Environmental Management Department

FROM:  J. E. Evered, Environmental Management, Bldg. T130B, X4934

SUBJECT: ECOLOGICAL MONITORING PROGRAMS AT RFP - JEE-0063-92

In general, we have not been sufficiently proactive on the issue of ecological monitoring, which is somewhat understandable given that it was, until recently, a low priority. The priority level of this issue is now rising rapidly, at least in the eyes of the government (primarily DOE and U.S. Fish and Wildlife Service), and it is essential that we gain control of it to prevent impacts to our credibility or award fee evaluation. I have directed that the following actions be undertaken immediately to address this issue:

(1) LEAD RESPONSIBILITY

- The National Environmental Policy Act Division (NEPA) is renamed the Ecology and NEPA Division (END) and will be the central focus of all ecology-related activities, including monitoring, NEPA baseline studies, Fish & Wildlife Coordination, Natural Resource Damages Assessment compliance, and related tasks.
- Related work performed by others in Environmental Management will be coordinated with the Ecology and NEPA Division for coherence, consistency, and efficiency. Work performed by END for any other division will be performed in a manner fully responsive to that division's needs.
- END will also serve as the principal point of contact with DOE, RFO on these issues.

(2) ECOLOGICAL MONITORING PROGRAM (EcMP)

- Comments recently received from DOE, RFO regarding the draft Environmental Monitoring Plan (EMP) clearly state that the ecological monitoring component of the plan does not adequately address long-term ecological monitoring needs of RFP. The ecological monitoring program as presented in the draft EMP is not a coordinated, manageable plan but only a collection of vignettes about existing studies. At present, no plan for an EcMP exists, yet it is essential that a plan be in place before submission of the final EMP and that a program get underway within the next fiscal year.
- Therefore, the Environmental Sciences Group of the Ecology and NEPA Division (END/ES) will undertake, as part of their existing sitewide biota responsibilities, the planning, implementation, and management of a sitewide EcMP. This monitoring program will assess and report on trends in terrestrial and aquatic biological media at RFP.
- The resulting EcMP will fully integrate Environmental Evaluation (EE) and Surface Water Division biological activities to assure the compatibility of, and smooth transition between, EE-, SWD-, and EcMP-derived data.

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- END/ES will also be responsible for obtaining the staff and funding required to operate an EcMP and will develop one or more work packages to define, schedule, fund, and control this program.
- Ecology and NEPA Division will report to me monthly on the status of its efforts to develop an effective EcMP to meet the needs of DOE, RFO and the Natural Resource Trustees.

(3) RESOURCE PROTECTION PROGRAM (RPP)

- Ecology and NEPA Division will undertake the development and implementation of a sitewide RPP which must include the following components: (a) a wetland restoration strategy to provide effective offsets for wetland losses resulting from remediation and operational activities, (b) a critical habitat augmentation strategy to put in place offsets for migratory bird and raptor habitat losses from remediation and operational activities, and (c) a threatened and endangered species protection strategy to preserve individuals of such species and their critical habitats. Implementation of these components will apply to both OU and sitewide activities.
- These strategies will be implemented so as to assure DOE, RFO that RPP is in compliance with the Endangered Species Act, the Fish and Wildlife Coordination Act, and the Migratory Bird Treaty Act.
- END/ES will assist and support DOE, RFO in coordinating resource protection activities with the U.S. Fish and Wildlife Service and the Colorado State Division of Wildlife.
- END/ES will be responsible for obtaining the staff and funding required to operate a RPP beyond that provided by the FY92 supplemental funding request, including the preparation of work packages.
- Ecology and NEPA Division will report to me monthly on the status of its efforts to develop these strategies to meet the concerns of DOE, RFO and the Natural Resource Trustees.

I ask that all of you provide full support to the Ecology and NEPA Division as it undertakes and begins to fulfill the above responsibilities.

BKH:lmg

cc:

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